

UNITED STATES
REGULATORY COMMISSION
WASHINGTON, D. C. 20555

D. J. Daniels

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September 6, 1983

MEMORANDUM FOR: H. Brent Clayton, Acting Chief
Procedures and Systems Review Branch
Division of Human Factors Safety

THRU: James W. Clifford, Acting Section Leader ^(P)
Section A - Procedures for JWC
Procedures and Systems Review Branch 6 SEP 83
Division of Human Factors Safety

FROM: William G. Kennedy
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SUBJECT: TRIP REPORT FOR TURKEY POINT VISIT OBSERVING .
NMSS REGULATORY EFFECTIVENESS REVIEW (RER)

As requested by the Division of Licensing, I accompanied the NMSS security evaluation team for a short period during their week long visit to the Turkey Point site in May 1983. The purpose of the team's visit was to conduct an RER of the site's security measures. The purpose of my visit was to learn what an RER entailed in order to support an evaluation by NRR as to whether NMSS was satisfactorily addressing NRR concerns in the safeguards area, particularly the interface between plant operational safety and security safeguards (referred to as "safety/safeguards"). I participated in representative portions of the overall review and discussions of the other portions on Tuesday, May 24 and Wednesday, May 25, 1983.

The Regulatory Effectiveness Reviews conducted by the Power Reactor Safeguards Licensing Branch (SGPR) of the Division of Safeguards in NMSS seems to have, as the major thrust, the inspection of the plants' safeguards measures against an assumed threat. The specified threat is a single insider or an armed group from outside the facility with the goal of sabotage resulting in a release to the environment above the 10 CFR Part 100 limits (for exclusion areas and low population zones: 25 rem whole body or 300 rem to the thyroid). The reviews consist of an independent identification of vital areas (areas for which access is necessary to operate or sabotage equipment to cause the release intended). The reviewers then inspect the security measures in force at the plant to protect these areas from an insider or outsider group. Representatives of the U. S. Army Special Forces assist in these reviews.

Based on the observations made and discussion held during the visit, the teams conducting the RERs seem to be very competent and thorough in their reviews of the security measures with respect to the purpose of the RER.

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They are also aware of the NRR concerns for necessary passage through security barriers for abnormal or emergency plant operations, specifically checking measures for authorized passage through security as well as other barriers encountered during their inspection.

Although the reviews appear to meet their intended objectives and are being conducted by dedicated and competent people, there are some weaknesses in the review methods from an NRR point of view:

1. The reviews are conducted without reference to the NRC approved site security plans or any written criteria (if any exist) and use what appears to be mostly judgement to perform the reviews. Therefore, there does not seem to be a regulatory basis from which to require changes in the site's security measures.
2. The inspection of security measures, from an operational safety point of view, is not based on analyzed conflicts in safety needs versus security needs, but on the overcoming of security measures for general operational safety reasons when encountered during the inspection tours.
3. The reviews seem to concentrate on making corrections to the security system at the plant and not on evaluating the effectiveness of the staff's requirements (RER).

Overall, the RER reviews seem to be fulfilling the perceived purposes of the reviews but may not be meeting NRR's needs.



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cc: D. McDonald